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Guam Housing and Urban Renewal Authority

IN THE UNITED STATES DISTRICT COURT TERRITORY OF GUAM

GOVERNMENT OF GUAM and DOUGLAS B. MOYLAN, in his official capacity as the Attorney General of Guam,

Plaintiffs,

v.

LOURDES A. LEON GUERRERO, in her official capacity as the Governor of Guam, and the GUAM HOUSING AND URBAN RENEWAL AUTHORITY, A Public Body Corporate and Politic,

Defendants.

CIVIL CASE NO. 24-00029

DECLARATION OF DANIEL MORRIS IN SUPPORT OF JOINT MOTION TO STRIKE AND TO DISMISS

I, **DANIEL MORRIS**, hereby declare as follows:

- 1. I am a temporary active member of the Guam bar and counsel of record for Defendant Lourdes A. Leon Guerrero, *I Maga'hågan Guåhan*, Governor of Guam, in the above-captioned matter. I submit this declaration in support of Defendants Leon Guerrero and Guam Housing and Urban Renewal Authority's Joint Motion to Strike and to Dismiss, submitted concurrently herewith. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently thereto.
- 2. Attached as Exhibit A is a true and correct copy of Coronavirus State and Local Recovery Funds, 86 Fed. Reg. 26,786 (May 17, 2021) (the "2021 Interim Final Rule") issued by the U.S. Department of the Treasury.
- 3. Attached as Exhibit B is a true and correct copy of the 2021 Interim Final Rule Frequently Asked Questions ("FAQs") issued by the U.S. Department of the Treasury.
- 4. Attached as Exhibit C is a true and correct copy of Coronavirus State and Local Recovery Funds, 87 Fed. Reg. 4,338 (Jan. 27, 2022) (the "2022 Final Rule") issued by the U.S. Department of the Treasury.
- 5. Attached as Exhibit D is a true and correct copy of the 2022 Overview of the Final Rule issued by the U.S. Department of the Treasury.
- 6. Attached as Exhibit E is a true and correct copy of the 2022 Final Rule FAQs issued by the U.S. Department of the Treasury.

- 7. Attached as Exhibit F is a true and correct copy of the Coronavirus State and Local Recovery Funds, 88 Fed. Reg. 64,986 (Sept. 20, 2023) (the "2023 Interim Final Rule") issued by the U.S. Department of the Treasury.
- 8. Attached as Exhibit G is a true and correct copy of the relevant Excerpt from the U.S. Army Corps of Engineers Facilities Condition Assessment for Guam Memorial Hospital (April 8, 2020).
- 9. Attached as Exhibit H is a true and correct copy of the relevant Excerpt from the Guam Medical Campus Master Plan (December 2022).
- 10. Attached as Exhibit I is a true and correct copy of the Coronavirus State and Local Fiscal Recovery Funds Allocations to Territories issued by the U.S. Department of the Treasury

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 13th day of January, 2025.

/s/ DANIEL MORRIS